

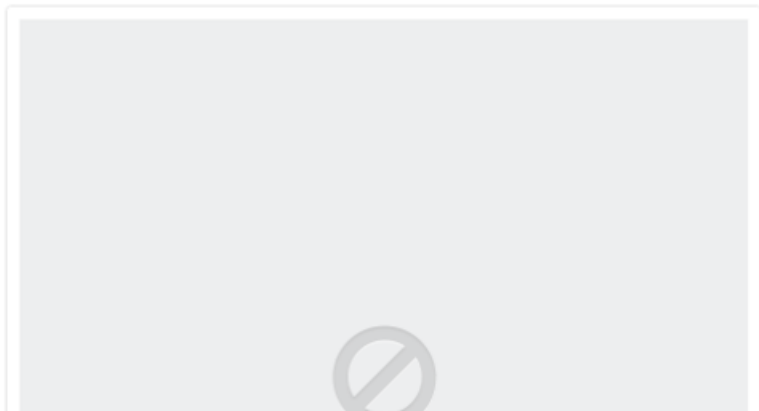
EXHIBIT A

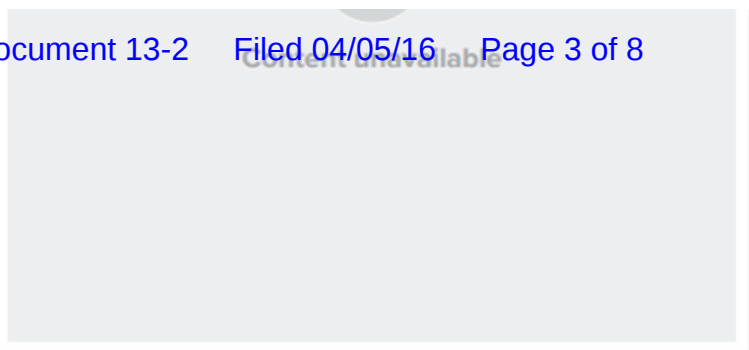
(Part 2 of 3)



Rosette Pambakian (center) and Ashley Terrill (right)

Terrill can be seen socializing with Pambakian on multiple occasions in several different Instagram postings, including one that includes a “#BFF” hashtag. When asked about her relationship with Rosette, Terrill told me via phone “we’re almost like sisters.” Pambakian agreed: “She’s a friend of mine,” but denied doing her any favors as a reporter. Still, Wolfe believes their relationship was a factor—if not the sole reason—that Terrill decided to start writing about a lawsuit that ended over a year ago. “Ashley was [originally] covering a lot of fashion and lifestyle stuff, she started covering Tinder because of her close relationships with Rosette.” It was an insinuation heavy enough to no longer be a mere insinuation.





Rosette Pambakian (center) and Ashley Terrill (right)

* * *

Less than a month after Wolfe reached out to me about Terrill's investigation, an acquaintance of mine contacted me with a strange story: This acquaintance had a friend in Los Angeles, a writer, who was being stalked and hacked while reporting. The writer was desperate for someone with whom to share the story—an ally, or at least an ear. The subject of her reporting, she said, and presumably the person behind this anti-journalistic intimidation, was Whitney Wolfe.

Over email, this acquaintance explained the situation—that her friend, Ashley Terrill, was researching a book about Wolfe, and that she had previously interviewed Wolfe and Rad:

There was never any mention of sexual harassment in the interview. The audio from the interview also states that [Whitney Wolfe] was transferred to Tinder and into the marketing department where she started dating her boss Justin and her position elevated. Ashley said she felt bad for [Whitney Wolfe] because she seemed so hung up on this guy who clearly didn't want to be with her.

[...]

Ashley is scared and believes [Whitney Wolfe] to have a wealth of resources at her disposal between a billionaire business partner and a wealthy Russian boyfriend. She is not sure what they are capable of, but she is hoping that they are just trying to intimidate her. She is seeing people following her at all hours of the day and night and wants to go public to protect herself.

In short, Terrill had decided to dig into the legitimacy of Wolfe's harassment suit against Tinder, and claimed she'd found vast inconsistencies that not only undermined the legal case, but Wolfe's entire character. It was deeply

Ashley saw [Whitney Wolfe] at an event where WW told her that she was so over Justin then heard from another source...that [Whitney] propositioned Justin later that evening and told me she was going to “fuck him tonight,” then showed up at his door naked underneath a coat. These sorts of stories led Ashley to follow WW and her Tinder lawsuit a bit more closely. She followed the case and obtained the court transcripts...It also contradicts her co-founder position and could potentially tarnish her feminist public image

Terrill had been writing pitches to editors and film agents seeking a book or movie deal. In them, she described the project:

[Wolfe’s] statements—captured in my never released audio—directly contradict key claims and timelines within her legal complaint. In discovering this discrepancy, I launched into a year of research to unearth the truth. To do so, I’ve been tracking down and interviewing key figures, uncovering documents, and diving into each claim wherever it takes me. I am now preparing to disclose my findings and discuss whether Wolfe is a heroine, femme fatale mastermind, or businesswoman who ruthlessly exploited every opportunity for her gain (even if unethically).

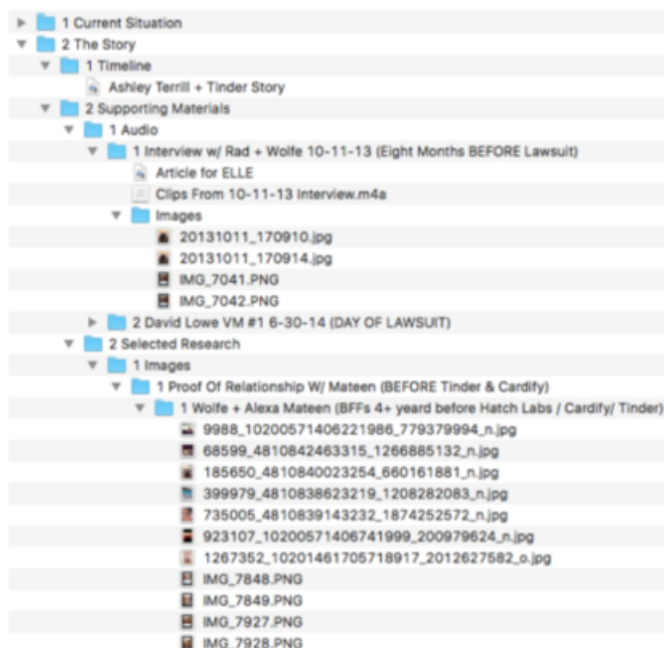
Terrill’s conclusion was that Wolfe is the last of those. It would be a feat of reporting, as she put it in one summary:

Wolfe’s Tinder co-founder claim seems nonexistent. Further, in promoting herself as the ‘sole female on the team,’ Wolfe eclipsed the recognition of other founding female team members.

When I eventually reached Terrill by phone, she sounded audibly alarmed—but though her claims look deeply paranoid on paper, she sounded more or less lucid, with the telephone manner of a celebrity interview veteran. She promised to relay to me a collection of her findings up to that point, backing up both accusations against Wolfe’s story and accusations of Wolfe’s intimidation tactics.

She didn’t disappoint. The next week, I was delivered three folders: One, labeled “#1 CURRENT SITUATION” provided a detailed timeline of vehicles and people Terrill believed had been following her, along with supposed evidence her computer and phone had been hacked. The other, labeled “#2 THE STORY” contained a bullet-point version of what Terrill says are inaccuracies in

Wolfe's Document 13-2, Filed 04/05/16 Page 5 of 8
 Wolfe's Document 13-2, Filed 04/05/16 Page 5 of 8
 The third folder, "DRIVE—FEMBOT 6," contained a jewelry box containing a cassette tape case containing a USB stick. On the USB was a maze of folders, containing timelines of both Wolfe's alleged stalking of Terrill and of the alleged fabrication of Wolfe's claim to have been a co-founder at Tinder. There were audio recordings, screenshots, reproduced email threads, and, for some reason, dozens of photos of Whitney Wolfe at various lunches and parties. One photo shows her in bed with an old boyfriend.



Screenshot of file library on USB drive sent to me by Ashley Terrill

All of this came packaged inside a large plastic purse, which I'd been told was a means of ensuring that it wouldn't be tampered with or swapped out in transit. The whole package led me to believe that Ashley Terrill is either completely out of her mind or caught in the middle of a plot ripped from a techno-thriller flick.

6W10690

Note: White Ford pick up truck. Two hispanic (driver + passenger). Afternoon in Santa Monica. I noticed the driver in this vehicle (first behind me) was holding up their smartphone device above their dashboard. I noticed this while in traffic, heading west on Olympic. The vehicle followed me after turning right onto a street. I pulled over to allow the vehicle to go ahead of me (and so I could get the plate number). I took a picture of the vehicle and plate. The vehicle then turned into a parking lot.

7JXH773 **not sure of the "H"***

Note: Blue-ish/ Grey Sedan, outside house at approx. 7:45pm on Thursday night, September 3rd. I went out to walk dogs. Spotted vehicle in the fire hydrant spot. Vehicle drove away, once I approached vehicle.

7KBW312

Note: Black Toyota Avalon. Outside my apartment complex at approx. 9:30AM on Friday, September 4th. Within fifteen minutes of spotting the vehicle (coming back from walking my dogs), it moved to three different parking spots around my apartment complex. First, the fire hydrant spot. Then, a legit parking spot (however, upon my approaching, moved). My sister went out to survey and take a picture. When my sister took a picture, the vehicle left.

Terrill says that only days after Wolfe learned of her investigation, she became the target of patterned surveillance. For example, on August 27th at 5:45 PM (emphasis is hers):

While on the phone, a black Rav4 [sic] with a Calvin and Hobbes “piss” sticker in his back window (located in the lower right hand corner) noticeable passed me on either Dorrington or Ashcroft a total of 6 times...I called the police...West Hollywood Police Department responded...The Male officer expressed that he had seen the car do a portion of the loop before arriving.

A day later, Terrill describes being followed into a gas station and watched by a man in a Jetta:

I was at the gas station for approximately 10 minutes, before this individual arrived. As I had already re-fueled my car, I moved my car closer to the pay phone area. The individual pulled up next to my car.

His window was down and his hair covered the side of his face the entire time he was in close proximity to me. He did not get out of his car, nor attempt to pump gas, nor go into the station store. After my phone call, I got into my vehicle and drove in a loop. Upon my return back, the grey Jetta was leaving the gas station.

After this, she says he stayed near her at CVS parking lot for an entire hour, never entering the store. Other instances include multiple instances of cars parked outside Terrill’s apartment building that departed as she exited.

Terrill’s dossier cited over ten vehicles’ plates she said were involved in her stalking. Also included was a complaint filed with the FBI’s Internet Crime Complaint Center after Terrill thought her laptop was illegally breached—in it, she values her research files at \$1,000,000. The complaint fingers Wolfe, her attorney David Lowe, and Andrey Andreev, Wolfe’s Russian billionaire business partner in Bumble: “I believe [they] have either directly hacked or hired a third party to hack the two computers in my office...the repeated attempts have continued up to the present day.” The five pages of allegations say Bumble or Wolfe specifically tried to derail Terrill’s story by remotely infiltrating her home WiFi network to tamper with files on her MacBook:

“I believe the party that victimized me wanted to illegally obtain the data and files on my computer to potentially use them, or release them without my permission...to potentially use them as a means of retaliation for the

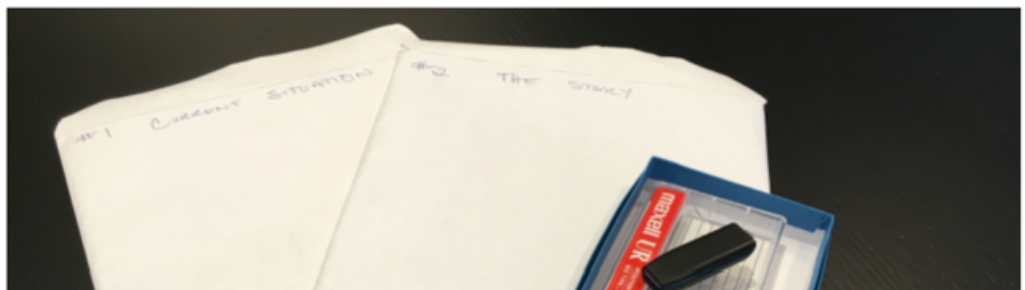
Terrill also speculates that by obtaining her files, Wolfe might have ammunition for a new lawsuit against Tinder.

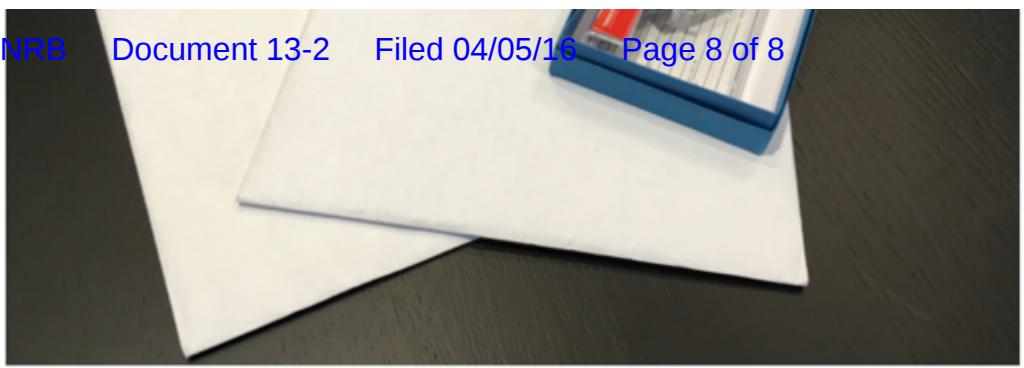
If Whitney Wolfe, or Bumble, or *someone* in the world wanted to push Ashley Terrill away from publicly calling Whitney Wolfe a liar and manipulator, it had at least worked for the time being. Terrill was in a state of absolute terror and perpetual anxiety—it hung on her voice as she mentioned each electronic device she’d locked in a vault, each email address she’d abandoned, the friends she could no longer contact, and the people she could no longer trust. I decided to buy her a burner phone so that she could talk to me for purposes of this story, but even that had to be relayed to her by a trusted concierge at the Beverly Wilshire. At the time we started speaking, a friend told me Ashley “was carrying a basket (seriously, an actual basket) full of documents related to her research that she does not want to leave out of her sight for fear someone might break into her car to steal it.” If this was all an act, it was a devoted performance.

But the actual evidence for all this alleged hacking and stalking is on the thin side: Terrill described slowness and “buffering” on her laptop, and recounted times when “files and documents that had been moved to the trash bin and cleared from the trash bin, reappeared.” This wasn’t evidence that she *hadn’t* been hacked, but it wasn’t really evidence of anything at all. After being told by a “Samsung specialist,” by her account, that a smartphone provided to her by PR firm PMK BNC had been compromised as well, she put all of her digital devices in a “security locker,” though the only evidence she furnished of a phone hack was a generic security warning message.

Nonetheless, Ashley Terrill was off the grid—on the day we first spoke, she was trying to gather enough cash to buy a new “burner laptop” without a paper trail. As for the shadowy cars, I had little to go on besides Terrill’s word, police complaints, plate numbers, and some blurry photographs of an SUV that are all supposed to fit into a pattern.

It’s exactly the kind of pattern that’s easy to map onto the world when you feel nervous and threatened—we usually call it paranoia.





Terrill made it clear that she'd come to Gawker not because she wanted to me to cover what was happening to her (although she certainly put that on the table), but because she wanted me to know what was happening to her in case something worse happened. Terrill never explicitly told me she feared for her life, but when you go into hiding and trash your phone because you think you're being tailed through Los Angeles by a team of strange men, that fear isn't hard to surmise. She eventually asked me to not contact her from my cell phone, in case I too was being surveilled.

Wolfe and Stith vehemently denied all accusations of stalking, hacking, and all other intimidation techniques "This is so false and so far-fetched, I couldn't even think up a scenario like it," Wolfe said, alternating between laughter and gasps on the phone. Wolfe denied that she'd ever had Terrill tailed or contracted a private investigator at any point: "Absolutely not. One hundred percent. We would never do that." This was repeated multiple times. No. Definitely not. Absolutely not. Never. Ditto on the computer hacking allegations ("Would never do that, have never done that") and remote phone tampering, which prompted laughter: "Absolutely not, no. [Terrill] has a brilliant future in creative writing."

I asked Wolfe if Andreev could've been involved in some digital foul play—part of his software stable includes SpyLog, a service that tracks a web browser's behavior across the internet. Though it's possible he'd have the knowhow (and resources) to break into Terrill's MacBook on the other side of the world, Wolfe dismissed this as preposterous: "Absolutely not. I don't even think he's aware of this." Although Wolfe wouldn't disclose exactly what Andreev's role in Bumble is, she noted they're in "daily contact," and "he would never do anything like that to anyone."

Then again, everyone else denies virtually everything else, too. Reached by phone, Rosette Pambakian told that although she does have a personal relationship with Ashley Terrill ("She's a friend of mine") she was only "vaguely aware" of her investigation—but made it clear to me that she believed her friend was in actual danger. And, despite being just barely aware of Terrill's work in progress, Pambakian told me she'd lose her job if "linked"